

Dow AgroSciences LLC
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Indianapolis, IN 46268-1054

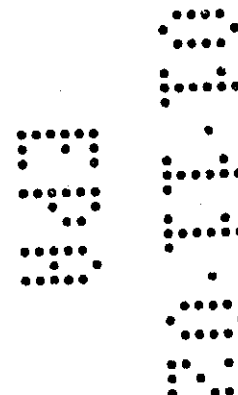
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308 Building/2A
October 19, 2001



Document Processing Desk - 6(a)(2)
Office of Pesticide Programs - 7504C
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460-0001

RE: FIFRA § 6(a)(2) Report
Vikane* Gas Fumigant
EPA Registration Number: 62719-4
Active Ingredient: Sulfuryl Fluoride
CAS Registry Number: 002699-79-8
DERBI Number: 104327
State: CA
Severity Category: H-B



Dow AgroSciences submits the following information in response to its understanding of the U.S. Environmental Protection Agency's interpretation of FIFRA § 6(a)(2). However, Dow AgroSciences has not concluded that this information regards an "unreasonable adverse effect on the environment" or that it is reportable under FIFRA § 6(a)(2).

Dow AgroSciences received the enclosed information regarding an alleged human exposure.

It is important to note that the Vikane Gas Fumigant label requires the introduction of chloropicrin to the structure prior to fumigation at a rate of one ounce per 10,000-15,000 feet (17-25 ppm) to serve as a warning agent. This warning agent causes smarting of eyes, tearing, throat and nose irritation, and a disagreeable pungent odor at very low concentrations (ca. 0.3 ppm).

The Vikane Gas Fumigant label states the following: "When fumigating, observe local, state and federal rules and regulations including such things as use of chloropicrin, clearing devices, positive-pressure self contained breathing apparatus, security requirements, and placement of warning signs: Extremely Hazardous Liquid and Vapor Under Pressure, Inhalation of Vapors may be Fatal." Under the "Preparation for Fumigation" section of the label, the use directions for structural fumigation state "Remove from the structure to be fumigated all persons, domestic animals, pets - including fish and desirable growing plants." Also, under the Aeration and Reentry section of the label, use directions state "... treated area must be aerated until the level of sulfurlyl fluoride is 5 ppm or less, as measured by a detection device with sufficient sensitivity such as an INTERSCAN or MIRAN gas analyzer." Within this section of the label it further states "Do not reoccupy fumigation site, i.e. building, ship, vehicle or chamber, nor move vehicle until aeration is complete."

If you wish to discuss this matter further, please call us.

Regards,

A handwritten signature in dark ink, appearing to read "Lynda Bruton".

Lynda Bruton
Product Stewardship Administrator
(317) 337-4656

Prepared by:

A handwritten signature in dark ink, appearing to read "Stacey Fruits".

Stacey Fruits
Product Stewardship Administrator
(317) 337-4577

*Trademark of Dow AgroSciences

Voluntary Industry Reporting Form for 6(a)(2) Adverse Effects Incident Information

Provide all known, required information. If required data field information is unknown, designate as such in appropriate area. Page# 1 of 3

Personal privacy information

Row 1	Reporter Name	Submission date.	Contact person (if different than reporter)	Internal ID 1-1533612
Administrative Data	[Redacted]		[Redacted]	
	Address		Address	
	[Redacted]		[Redacted]	
	Phone #		Phone #	
	Incident Status: New	Location and date of incident <i>Santa Ana California</i> 9/17/01	Date registrant became aware of incident. 9/26/01	Was incident part of larger study? No
Row 2	EPA Registration # (Product 1)	EPA Registration # (Product 2)	EPA Registration # (Product 3)	
Pesticide(s) Involved	62719-4			
	A.I. (s)	A.I. (s)	A.I. (s)	
	<i>Sulfuryl Fluoride</i>			
	Product 1 name	Product 2 Name	Product 3 Name	
	<i>Vikane</i>			
	Exposed to concentrate prior to dilution?	Exposed to concentrate prior to dilution?	Exposed to concentrate prior to dilution?	
	Formulation	Formulation	Formulation	
Row 3	Evidence label directions were not followed? Yes	Incident site: (examples include home, yard, school, industrial, nursery/greenhouse, surface water, commercial turf, building/office, forest/ woods, agricultural (specify crop) right-of-way (rail, utility, highway)). <i>Own Residence</i>	Situation (act of using product): (examples include mixing/loading, reentry, application, transportation, repair/ maintenance of application equipment, manufacturing/ formulating).	
Incident Circumstances	Intentional misuse? Yes			
	Applicator certified PCO? Not applicable		<i>Other</i>	
	How exposed: (examples include direct contact with treated surface, ingestion, spill, drift, runoff)			
	<i>See Incident Description</i>			

Brief description of incident circumstances.

9/26/01 4:29:06 PM no product numbers

Caller inquires if product can cause grand mal seizures.

Residence was fumigated on 09/17. 33 yo husband was on property at that time. Was on side of yard, close to tent. He was also 'fooling around' with tent, apparently lifting it, so caller thinks he might have inhaled product. Family was staying at another residence where husband had grand mal seizure approx. 90 min. after returning from own residence. 911 was called. Husband with vomiting and low blood sugar (60; units n/a). Was taken to ED. Seizure lasted 45 min. No incontinence. Has been seen by neurologist. CT scan and all other tests have been wnl, but SGPT, taken on 09/17, was elevated (unknown value). Husband also has had bloodshot eye and sore throat for the past several days (caller unable to specify onset). Caller has done some 'research' on the Internet.

Rec:

Discussed tox profile of product and typical sxs. after overexposure. Exposure not evident. Would not typically expect sxs. as described with this hx. Discussed that Internet is not always a reliable source of information. Gave case# to forward to MD. Cb prin. Consulted Clin Tox DF. Notified client liaison JG by e-mail.

9/27/01 4:21:35 PM Attempted cb. No answer after several rings. Left message for f/u.

On follow-up, please inquire about whether patient has a hx of seizure activity

9/28/01 12:18:43 PM Left message on machine for cb.

9/28/01 2:59:09 PM Husband is going to see a gastroenterologist today because he had elevated liver enzymes. He seems to be feeling a lot better. Energy has come back. Throat is still sore but vomiting and ocular redness has gone away.

A: Will document recovery. Have MDs Cb with any ?'s or concerns.

10/1/01 12:16:04 PM Spoke to [REDACTED] She states her husband is doing fine. His liver enzymes are actually declining now.

She states he does not have a history of seizures, however, the neurologists did state that the patient's history of panic attacks may have been a misdiagnosed seizure disorder.

Voluntary Industry Reporting Form for 6(a)(2) Incident Information Involving Humans

Provide all known, required information. If required data field information is unknown, designate as such in appropriate area. Page# 3 of 3

Demographic information: Age: 33 Years Sex: Male Occupation (if relevant)	Exposure route: Unknown	Was adverse effect result of suicide/homicide or attempted suicide/homicide? No	Was protective clothing worn (specify)? Not applicable
If female, pregnant? Did not query	Was exposure occupational? No If yes, days lost due to illness:	Time between exposure and onset of symptoms: See Symptoms	
Type of medical care sought: (examples include none, clinic, hospital emergency department, private physician, PCC, hospital inpatient). HCF	List signs/symptoms/adverse effects Seizure (status) - 3 hrs or less , Vomiting - 3 hrs or less , Hypoglycemia - 3 hrs or less , Redness - Unable to determine , Throat Irritation - Unable to determine ,		If lab tests were performed, list test names and results (If available, submit reports)
Exposure data: Amount of pesticide: Exposure duration: Weight:			
Human severity category: HB			

This box can be used to provide any explanatory or qualifying information surrounding the incident. (add additional pages if necessary)

There is some questions as to accuracy of what transpired in this incident. Typically, isolated seizure activity is not typically associated with the toxicological profile of Vikane. Also, the rise in liver enzymes is not a typical marker of Vikane induced toxicity.

Internal ID #
1-1533612